

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

BYTEMARK, INC.,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action No. 6:22-cv-00304-ADA
	§	
MASABI LTD.,	§	JURY TRIAL DEMANDED
	§	
Defendant	§	

**DEFENDANT MASABI'S PROPOSED CLAIM TERMS FOR CONSTRUCTION
REGARDING U.S. PATENT NOS. 10,360,567 and 10,346,764**

Pursuant to the Standing Order Governing Patent Proceedings 4.4 and the Court's Scheduling Order (Dkt.#40), Defendant Masabi Ltd. ("Defendant") hereby serves its Proposed Claim Terms for Construction concerning United States Patent Nos. 10,360,567 ("the '567 Patent), and 10,346,764 ("the '764 Patent") (collectively the "Patents-in-Suit") on Plaintiff Bytemark, Inc.("Bytemark").

MASABI'S LIST OF PROPOSED TERMS TO BE CONSTRUED

- 1-pass
- 2-behavioral anomalies
- 3-time stamp
- 4- the pass data
- 5- mismatch of a hash value
- 6- updated usage data
- 7- fraudulent activity bit

Bytemark has not provided sufficient infringement contentions from which their apparent interpretation of the claim terms could be inferred. Therefore, Masabi reserves the right to amend,

supplement, and correct the aforementioned list of terms as information becomes available.

BROZYNSKI & DALTON PC

DATED: March 12, 2024

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CERTIFICATE OF SERVICE

This is to certify that all known counsel of record who are deemed to have consented to electronic service are being served with a copy of this document on this the 12th day of March 2024.

By: Douglas LaLone